

4. The averments set forth in paragraph 4 constitute conclusions of law, to which no response is required. Otherwise Plaintiffs lack knowledge and information sufficient to form a belief as to the truth of the averments. Otherwise denied.

5. Plaintiffs lack knowledge and information sufficient to form a belief as to the truth of this averment. Otherwise denied.

6. The averments set forth in paragraph 6 constitute conclusions of law, to which no response is required. Otherwise Plaintiffs lack knowledge and information sufficient to form a belief as to the truth of the averments. Otherwise denied.

7. The averments set forth in paragraph 7 constitute conclusions of law, to which no response is required. Otherwise Plaintiffs lack knowledge and information sufficient to form a belief as to the truth of the averments. Otherwise denied.

8. Plaintiffs lack knowledge and information sufficient to form a belief as to the truth of this averment. Otherwise denied.

9. Plaintiffs lack knowledge and information sufficient to form a belief as to the truth of this averment. Otherwise denied.

10. Plaintiffs lack knowledge and information sufficient to form a belief as to the truth of this averment. Otherwise denied.

11. Plaintiffs lack knowledge and information sufficient to form a belief as to the truth of this averment. Otherwise denied.

12. Plaintiffs lack knowledge and information sufficient to form a belief as to the truth of this averment. Otherwise denied.

13. Plaintiffs lack knowledge and information sufficient to form a belief as to the truth of this averment. Otherwise denied.

14. Paragraph 14 sets forth conclusions of law, to which no response is required. Otherwise denied.

15. Denied.

16. Denied.

17. Plaintiffs respectfully refer the Court to the Application for the contents thereof. Otherwise denied.

18. Plaintiffs respectfully refer the Court to the Application for the contents thereof. Otherwise denied.

19. Admitted that the Trust was listed as the owner of the Policy on the Application and admitted that Judah Zelmanowitz was the original Trustee of the Trust. Otherwise denied.

20. Admitted that the Trust was created on May 1, 2008, which is before the May 5, 2008 date on the signature page of the Application. Otherwise denied.

21. Plaintiffs respectfully refer the Court to the Application for the contents thereof. Otherwise denied.

22. Plaintiffs respectfully refer the Court to the so-called amendment for the contents thereof. Otherwise denied.

23. Plaintiffs respectfully refer the Court to the Application for the contents thereof. Otherwise denied.

24. Plaintiffs respectfully refer the Court to the Application for the contents thereof. Otherwise denied.

25. Admitted that Exhibit B contains a true and correct copy of the Premium Funding Intent Form. Plaintiffs respectfully refer the Court to the Premium Funding Intent Form for the contents thereof. Otherwise denied.

26. Plaintiffs respectfully refer the Court to the Premium Intent Form for the contents thereof. Otherwise denied.

27. Plaintiffs respectfully refer the Court to the Premium Intent Form for the contents thereof. Otherwise denied.

28. Plaintiffs respectfully refer the Court to the Premium Intent Form for the contents thereof. Otherwise denied.

29. Admitted that the Friedman Policy (Policy No. 01N1388782) was placed in force with an Issue Date of July 11, 2008, and with a face amount of \$2 million. Otherwise denied.

30. Plaintiffs lack knowledge and information sufficient to form a belief as to the truth of this averment. Otherwise denied.

31. Denied.

CAUSE OF ACTION
DECLARATORY JUDGMENT-LACK OF INSURABLE INTEREST

32. Plaintiffs incorporate by reference their answers and denials to the preceding paragraphs as if set forth herein.

33. Paragraph 33 sets forth conclusions of law, to which no response is required. Otherwise denied.

34. Denied.

35. Denied.

36. The averments set forth in this paragraph constitute conclusions of law, to which no response is required. Otherwise denied.

Dated: November 21, 2011

Respectfully submitted,

/s/ Seth Ard

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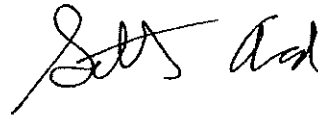
CERTIFICATE OF SERVICE

I, Seth Ard, hereby certify that a true and correct copy of the foregoing Plaintiff's Answer to Defendant's Counterclaim was filed with the United States District Court for the Eastern District of New York using the ECF system and via email as a courtesy:

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Dated: November 21, 2011

A handwritten signature in black ink, appearing to read 'Seth Ard', is written above a horizontal line.

Seth Ard